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*Counsel to Joint Liquidators of Kingate Global  
Fund Ltd. and Kingate Euro Fund Ltd.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FEDERICO CERETTI, *et al.*

Defendants.

Adv. Pro. No. 09-1161 (SMB)

**CERTIFICATE OF NO OBJECTION TO KINGATE FUNDS' MOTION FOR LEAVE  
TO FILE AMENDED ANSWER**

Defendants Kingate Global Fund, Ltd. (“Kingate Global”) and Kingate Euro Fund, Ltd. (“Kingate Euro” and together with Kingate Global, the “Kingate Funds”), by and through their undersigned counsel, submit this certificate pursuant to Local Bankruptcy Rule 9075-2, and respectfully represent:

1. On June 14, 2017, the Kingate Funds filed their Motion For Entry Of Order Under Rule 15 Of The Federal Rules Of Civil Procedure, As Incorporated By Rule 7015 Of The Federal Rules Of Bankruptcy Procedure, Granting Motion For Leave To File Their Amended Answer (ECF No. 301) (the “Motion”), with service effected on June 14, 2017.

2. The deadline for filing objections to the Motion expired on June 21, 2017, at 5:00 p.m (the “Objection Deadline”).

3. Counsel for Defendants have reviewed the Court’s docket not less than forty-eight (48) hours after expiration of the Objection Deadline and to date, no objection, responsive pleading, or request for a hearing with respect to the Motion appears thereon.

4. An electronic copy of a proposed order (the “Order”), that is substantially in the form of the proposed order that was filed on June 14, 2017 (ECF No. 304), is annexed hereto as **Exhibit A**.

*[Remainder of page intentionally left blank]*

WHEREFORE, the Defendants respectfully request that, pursuant to Local Bankruptcy Rule 9075-2, the Court enter the proposed Order granting Defendant Kingate Funds' motion for leave to file their amended answer.

Dated: New York, New York  
June 23, 2017

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

/s/ Robert S. Loigman

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